

THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

LISA MENNINGER,

Plaintiff,

v.

PPD DEVELOPMENT, L.P.,

Defendant.

Civil Action No: 1:19-CV-11441-LTS

PLAINTIFF'S TRIAL BRIEF

Plaintiff hereby submits her Trial Brief in accordance with the Court's Order Setting Case for Trial.

A. Motions in Limine

Plaintiff has filed the following motions:

- (1) Motion *in Limine* to Preclude Defendant's Use of "Voluntary Self-Identification of Disability" Form (Doc. No. 113).
- (2) Motion *in Limine* Pursuant to Fed. R. Civ. P. 37(c)(1) to Preclude Defendant's Medical Expert from Testifying on Matters Not Disclosed in Original Expert Report (Doc. 116).

B. Proposed Statement of the Case

The plaintiff, Dr. Lisa Menninger, claims that she was subjected to unlawful discrimination and retaliation by her former employer, Defendant PPD Development, L.P. Plaintiff claims that these actions stem from her disclosure to PPD that she suffered from disabilities—specifically, Social Anxiety Disorder and Panic Disorder—and from her request that Defendant provide her with reasonable accommodations for those alleged disabilities. Plaintiff further alleges that

Defendant's actions severely exacerbated her pre-existing medical conditions, caused her to develop major depression, and ultimately rendered her unable to work. Defendant denies these claims.

C. List of Potential Witnesses

Attached as Exhibit A.

D. Proposed Voir Dire Questions

Attached as Exhibit B.

E. Proposed Jury Instructions

Attached as Exhibit C.

F. Proposed Verdict Form

Attached as Exhibit D.

Respectfully submitted,

/s/ Patrick J. Hannon

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Attorneys for Plaintiff Lisa Menninger

Date: March 10, 2023

CERTIFICATE OF SERVICE

I, Patrick J. Hannon, certify that on March 10, 2023, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to Defendant by electronically serving its counsel of record.

/s/ Patrick J. Hannon
Patrick J. Hannon